



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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November 16, 2016

Mr. Joseph Eckerle
GM/VP Operations
Pelican Products, Inc.
147 North Main Street
South Deerfield, MA 01373

RE: South Deerfield
Transmittal No.: X271746
Plan Approval No.: WE-16-015
FMF No.: 130642
AIR QUALITY PLAN APPROVAL

Dear Mr. Eckerle:

The Massachusetts Department of Environmental Protection ("MassDEP"), Bureau of Air and Waste, has reviewed your Limited Plan Application ("Application") listed above. This Application concerns the proposed control of fugitive volatile organic compounds ("VOC's") at your manufacturing facility located at 147 North Main Street in South Deerfield, Massachusetts ("Facility").

The Facility currently has no air quality permits. This current application for an Approval is based on the results of an internal audit conducted pursuant to "Incentives for Self-Policing Environmental Audit Policy" (POLICY ENF-07.002)

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 "Air Pollution Control" regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-O, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP's review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner/operator ("Permittee") must comply in order for the Facility to be operated in compliance with this Plan Approval.

1. DESCRIPTION OF FACILITY AND APPLICATION

Pelican Products, Inc. (the “Facility”) is a manufacturer of heavy duty injection and roto-molded plastic cases for the protection of a variety of sensitive products, such as scientific instruments and electronics, during transportation and storage. The facility also manufactures insulated coolers.

Once manufactured, the cases and coolers are moved to an assembly area where insulation is installed. The coolers are insulated by injecting urethane foam while the cases have protective foam glued to the interior. The VOC emissions sources in this area result from the solvents used for spot cleaning of the cases and coolers, adhesives used to secure foam inside the coolers and cases and inks for completion of the hand painted company logos and other markings. Other VOC emission sources at the facility result from cleaning the various size product molds between production runs.

Currently, the Facility contains no air pollution control devices (“PCD’s”) and therefore is not subject to 40 CFR Part 64, Compliance Assurance Monitoring standards. Because there are no PCD’s intended to capture or destroy VOC emissions, all VOC emissions are fugitive emissions.

The facility assigns an emission factor of 100% to all of the VOC emitting products used to construct and finish the coolers and cases. Fifty-five (55) gallons of coatings which do not meet the 3.4 pounds of VOC per gallon (pounds per gallon or “ppg”) of coating, may be used in any 12 month rolling period. Spray-cans, containing a volume of sixteen (16) ounces or less, make up the remaining coatings which exceed the 3.4 ppg VOC limitation and are not required to meet the coating requirements of 310 CMR 7.18.

Operational limits are set by the production limitations of the equipment used to mold the coolers and cases. Operating the production equipment at maximum capacity for cooler production only, yields estimated production of 120000 coolers per year, based on the current production methodology. Production of other products, such as the secure cases, would reduce that number. Regardless of production numbers the facility estimates that at full production facility-wide VOC emissions will not exceed either 8.9 tpy or 1.5 tons per any one month.

This Limited Plan Approval establishes Emission Unit #1 that encompasses the entire production and finishing process for all coolers and cases produced by the current eight (8) roto-molding machines, cleaning of machine heads between production runs, and the insulation, spot cleaning and completion of all coolers and cases in the Facility’s production, assembly and finishing areas.

EMISSION UNIT (EU) IDENTIFICATION

Each Emission Unit (“EU”) identified in Table 1 is subject to and regulated by this Plan Approval. In this instance EU-1 is the only EU at the facility and as such EU-1 VOC emission limits cap the Facility-Wide VOC potential to emit.

Table 1			
EU#	Description	Design Capacity	Pollution Control Device (PCD)
EU-1	Roto-molding of high quality storage cases and coolers of various sizes. Spot cleaning of eight (8) roto-mold machine heads between production runs Cooler insulation foam injection Case foam installation Cooler assembly and finishing Case assembly and finishing	Varies depending on number of changes in unit type and size produced.	none

Table 1 Key: EU# = Emission Unit Number

PCD = Pollution Control Device

2. **APPLICABLE REQUIREMENTS**

A. **OPERATIONAL, PRODUCTION and EMISSION LIMITS**

The Permittee is subject to, and shall not exceed the Operational and Emission Limits as contained in Table 2 below:

Table 2			
EU#	Operational / Emission Limit	Air Contaminant	Emission Limit
EU-1	<ol style="list-style-type: none"> 2,009 gallons of coating applied per year. No more than 861 gallons of isopropanol cleaning solution per year. No more than 100 gallons of other cleaning solvents used per year. The total amount of other coatings containing greater than 3.4 pounds VOC per gallon, shall not exceed 55 gallons in any year excluding coatings in containers that are less than 16 ounces in volume. 	VOC	<p>$\leq 17,800$ pounds per year (8.9 tpy) ≤ 1.5 tons per month.</p> <p>compliant coatings shall contain ≤ 3.4 pounds of VOC per gallon, as applied</p>

Table 2 Key:

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

YEAR = any 12 consecutive month period

TPY = tons per year

B. COMPLIANCE DEMONSTRATION

The Permittee, although not operating any Pollution Control Devices (“PCDs”) at the Facility with regards to Emission Unit #1, is subject to, and shall comply with, the following monitoring, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below:

Table 3	
EU#	Monitoring and Testing Requirements
	1. The Permittee shall monitor the daily solvent usage in the cleaning of production equipment (Roto-molding heads) of the case and cooler production operations.
	2. The Permittee shall monitor the daily use of adhesives, coatings and IPA (for spot cleaning) the coolers and cases in the case and cooler assembly and finishing operations.
	3. The Permittee shall monitor the employee implementation of the BMP’s and SOMP’s once every 180 days to ensure that they are performed as described in the Application and supporting documents. Permittee shall institute a re-training program if improper implementation by employees is observed.
	4. The Permittee shall monitor to ensure sufficient information is being collected and documented in order to be available to comply with 310 CMR 7.12 Source Registration.
	5. The Permittee shall monitor the VOC content of all products not previously listed, that are used in the cooler and case production, equipment cleaning and individual unit finishing operations, including but not limited to: insulations, coatings (inks, glues and paints), diluents and cleaning solvents, foams fillers and adhesives.

Table 3 Key:

EU# = Emission Unit Number

BMP = Best Management Practices

IPA= Isopropanol

SOMP = Standard Operating and Maintenance Procedure

VOC = Volatile Organic Compounds

Table 4

EU#	Record Keeping Requirements
EU-1	1. The Permittee shall maintain daily records sufficient to demonstrate compliance with the 3,000 pounds per month and 17,800 pounds per year VOC emission limit per each 12 consecutive month period, as specified herein and in the application and associated documents.
	2. The Permittee shall maintain daily records of the identity, quantity, formulation (including HAP's), solids content and density of insulations, coatings (inks, glues and paints), diluents and cleaning solvents (IPA), foams and adhesives used.
	3. The Permittee shall track records of the actual quantity of all VOC containing products used including but not limited to: spray foam insulation, coatings (inks, glues and paints), diluents and cleaning solvents, and adhesives.
	4. The Permittee shall maintain the following records for coatings which have a VOC content in excess of the limitation specified in Table 2, condition #4 herein: a. The identity and VOC content of each coating used in EU-1. b. The amount, in gallons, of each coating used in EU-1 during each month and each consecutive 12 month period. c. The total amount, in gallons, of all non-compliant coatings used during each month and each consecutive 12 month period.
	5. The Permittee shall maintain adequate records on-site to demonstrate compliance with all operational, production, and emission limits contained in Table 2 above. Records shall also include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 th day following each month.
	6. The Permittee shall maintain records of monitoring re-training as required by Table 3, condition #3.
	7. The Permittee shall maintain a copy of this Plan Approval, underlying Application and supplemental information submitted to support said Application, and the most up-to-date SOMP for the EU approved herein on-site. These records shall be maintained together for MassDEP's on site review.
	8. The Permittee shall maintain a record of routine maintenance activities performed on the approved EU. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	9. The Permittee shall maintain records to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.
	10. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.

Table 4	
EU#	Record Keeping Requirements
	11. The Permittee shall make records required by this Plan Approval available to MassDEP and United States Environmental Protection Agency personnel upon request.

Table 4 Key: IPA = Isopropanol EU# = Emission Unit Number BMP = Best Management Practices
SOMP = Standard Operating and Maintenance Procedure

Table 5	
EU#	Reporting Requirements
EU-1	1. The Permittee shall notify MassDEP in writing within thirty (30) calendar days of any changes in BMP's or SOMP's for the cooler and case finishing operations compared to those stated in the Application and used as the basis for this Approval, if such change will result in higher emissions of VOC.
	2. The Permittee shall notify MassDEP in writing within thirty (30) calendar days of any changes in inventory accounting procedures or the mass balance calculations used to obtain the VOC emission factors used as the basis for this Approval.
	3. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a "Responsible Official" as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	4. The Permittee shall notify the Western Regional Office of MassDEP, BAW Permit Section Chief by telephone: 413-755-2115, email: Marc.Simpson@state.ma.us or fax: 413-784-1149, as soon as possible, but no later than three (3) business day after discovery of an exceedance(s) of Table 2. A written report shall be submitted to Permit Section Chief at MassDEP within ten (10) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	5. The Permittee shall report triennially (every three years) to MassDEP, in accordance with 310 CMR 7.12, all information as required by the Source Registration/Emission Statement Form. Pursuant to 7.12(1)(a)7., the Permittee is required to file Source Registration as a condition of this Plan Approval.
	6. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.

Table 5 Key:

EU# = Emission Unit Number
BMP=Best Management Practice

VOC= Volatile Organic Compound
SOMP=Standard Operating and Maintenance Procedure
BAW=Bureau of Air and Waste

4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
EU-1	<ol style="list-style-type: none"> 1. The Permittee shall evaluate the SOMP's and BMP's on an annual basis to ensure that they meet or exceed the best available industry standards and work practices to limit VOC emissions. Such work practices include but are not limited to: <ol style="list-style-type: none"> a. store all VOC-containing coatings, equipment cleaning waste materials and VOC-containing solvents in closed containers; b. ensure that mixing and storage containers used for VOC-containing coatings, process equipment cleaning waste materials, and VOC-containing materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC-containing coatings, process equipment cleaning waste materials, and VOC-containing materials; d. convey VOC-containing coatings, process equipment cleaning waste materials, and VOC-containing materials from one location to another in closed containers or pipes; e. minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that: <ol style="list-style-type: none"> i. equipment cleaning is performed without atomizing the cleanup solvent; and, ii. all spent solvent is captured in closed containers; f. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container; and g. all solvent use and clean-up operations are to be performed in accordance with BMP's for solvent management provided in the application and additional documents attached thereto. 2. Any prior Plan Approvals issued under 310 CMR 7.02 shall remain in effect unless specifically changed or superseded by this Plan Approval. The Facility shall not exceed the emission limits and shall comply with approved conditions specified in the prior Plan Approval(s) unless specifically altered by this Plan Approval.

Table 6 Key:

BMP=Best Management Practice

SOMP=Standard Operating and Maintenance Procedure

EU# = Emission Unit Number

VOC= Volatile Organic Compound

B. The Facility has no stacks associated with any of the emission units performing cooler and case manufacturing and finishing operations.

5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and / or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. The Permittee shall conduct emission testing, if requested by MassDEP, in accordance with USEPA Reference Test Methods and regulation 310 CMR 7.13. If required, a pretest protocol report shall be submitted to MassDEP at least 30 days prior to emission testing and the final test results report shall be submitted within 45 days after emission testing.
- K. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

7. APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Bob Shultz by telephone at 413-755-2210, or in writing at the letterhead address.

Date: November 16, 2016

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Marc Simpson
Permit Section Chief
Bureau of Air and Waste
Western Region

ecc: Marc Simpson, Peter Czapienski-DEP/WERO; Heather Parent, MassDEP/Legal;
Yi Tian-MassDEP/Boston